

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Reassessment of Federal Communications)	ET Docket No. 13-84
Commission Radiofrequency Exposure Limits and)	
Policies)	
)	
Proposed Changes in the Commission's Rules)	ET Docket No. 03-137
Regarding Human Exposure to Radiofrequency)	
Electromagnetic Fields)	
)	

To: Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Reply Filed by: Charyl Zehfus
N6158 N. 61st Street
Sheboygan, WI 53083
szeefas@yahoo.com
920-467-4853

September 12, 2013

AFFIDAVIT OF Charyl Zehfus

State of Wisconsin

Sheboygan Count

I, Charyl Zehfus _____, attest that my statements are true to the best of my knowledge.

Reply round for FCC ET Docket No. 013-84 and ET Docket No. 03-137

1. My name is _Charyl Zehfus . My address is _N6158 N. 61st Street, Sheboygan, WI 53083 _____.

2. I am retired librarian, and an active researcher/writer.

3. **Summary:** Responding to the FCC questions in this docket, I will show **why a Precautionary Action** taken by the FCC with regards to its RF limits **would be useful**, and how it could be **efficient, practical, cost effective and humane**.

4. LACK OF CONSENSUS DOES NOT MEAN NO RISKS

In Paragraph 6 of this docket the FCC states that “there is a lack of scientific consensus about the possibility of adverse health effects at exposure levels (of radiofrequency/microwaves (RF/MW)) at or below our existing limit.” This does not mean there are no risks. It simply means that the FCC has chosen to ignore all the scientists, experts and thousands of studies that have found biological effects and damage. See FCC docket details here:

http://transition.fcc.gov/Daily_Releases/Daily_Business/2013/db0422/FCC-13-39A1.pdf

Another governmental agency, the National Institute of Environmental Health Sciences (NIEHS), states that the large number of cell phone users “could potentially be a widespread public health concern **if adverse health effects are shown to be associated** with cell phone use...**More research is needed**,” they wrote. (webpage doc attached)

<http://www.niehs.nih.gov/health/topics/agents/cellphones/index.cfm>

The National Institute of Health (NIH) also confirmed the lack of proof for safety of non-thermal RF at Medline Plus in a search on electromagnetic fields: “Some people worry that wireless and cellular phones cause cancer...**Scientists need to do more research on this before they can say for sure.**” (webpage doc attached) But the FCC has not yet heeded this officially recognized uncertainty and adopted biologically protective exposure limits.

<http://www.nlm.nih.gov/medlineplus/electromagneticfields.html>

5. U.S. AGENCIES SUGGEST PRUDENT AVOIDANCE OF EMF

Government agencies, both state and federal, suggest the prudent avoidance of electromagnetic radiation. My own state of Wisconsin's Department of Health wrote, "Until more is known about the effects of electromagnetic frequencies (EMF), prudent avoidance is advised." (webpage attached) <http://www.dhs.wisconsin.gov/eh/Air/pdf/EMF.pdf>

The National Institute of Environmental Health Sciences recommended early on that anyone concerned about the possible side effects of EMFs may do the following to reduce exposure:

- Increase the space between a person and devices that may emit EMFs.
- Avoid standing too close to computers, microwave ovens, or TVs.
- Reduce the time of exposure to possible EMFs by turning off devices such as electric blankets when not in use.
- Avoid keeping such devices as electric alarm clocks too close to the bed.
- Discourage children from playing near high power lines or transformers.
- Avoid activities near EMF sources. (webpage doc attached)

<http://archive.hhs.gov/news/press/1996pres/960620b.html>

Why would prudent avoidance be worthy of mention at government sites? Because these authorities believed that there must be some risks associated with EMF exposures. They wanted to help people take voluntary action to try to protect themselves. But current FCC RF limits allow so many new wireless devices and services to emit bursts and pulses everywhere that they obstruct a conscientious person's attempts at prudent avoidance.

6. NUREMBERG CODE VIOLATED BY FCC LACK OF PROTECTION

It was recognized in 2002 at an OSHA meeting that the U.S. was not going to use the precautionary principle with regards to wireless technology radiation, unlike other countries. (webpage OSHA doc attached)

This short-coming of not protecting public health against bio-active RF/MW radiation actually violates the 1948 Nuremberg Code, which prohibits involuntary experimentation exposing people without their informed consent to substances or emissions with potential harm possible.

The U.S Department of Health and Human Services webpage lists the points of the Nuremberg Code. Each point relates to the involuntary, risky RF public exposures allowed by current FCC limits. Following are my thoughts on each of the ten points, which can be found listed on the attached DHHS webpage.

- (1) There is no voluntary or informed consent of each individual American who is routinely exposed to radiation that is not yet known to be harmless, and indeed has thousands of studies showing biological damage at levels much lower than allowed.

- (2) Other means of study on animals and cells could be done to better understand the biological impacts before subjecting the public on the grand scale that is happening. This wireless radiation effects on the population is a haphazard, uncontrolled experiment, but will eventually reap epidemiological results. They should have done more without humans first.
- (3) The FCC routinely ignores the thousands of reputable animal and cellular studies, both current as in the 2012 BioInitiative Report, and cumulative, such as the U.S. military compilation in 1972 by Zory R. Glaser, as sampled at Magda Havas website. (downloaded with my earlier comment). Their limits are based on their assumption that only microwave heating levels are harmful. But this assumption is based on cherry-picking studies and sources.
- (4) The current wireless radiation roll-out does not allow anyone to avoid any potential or actual (as reported) physical or mental suffering or injury. No provisions for any subjects in this test are made, no matter how ill or vulnerable to environmental toxins they may be.
- (5) Death or disability and chronic injury will occur to those most vulnerable first. Studies show damage to the heart, nervous system, brain, sperm, breast cells, etc.. Vulnerable groups include fetuses, pregnant women, children of all ages, the elderly, the ill and individuals with electromagnetic sensitivity, a functional impairment disability recognized by the Access Board for the Americans with Disabilities Act.
- (6) The degree of risk to the public is utterly ignored or denied by the FCC.
- (7) No preparations or provision have yet been made for vulnerable individuals or groups to help mitigate their chronic, involuntary RF exposure and risks.
- (8) The great wireless roll-out experiment concerns itself with technical and marketing aspects, as controlled by the industry and loyal regulators. The FCC itself has no skill or credential to qualify it to create biologically-based limits to protect public health. It must get Congress to involve the EPA environmental experts.
- (9) No person participating in the wireless radiation experiment can ever quit, even in the midst of acute physical or mental discomfort or impairment from placement of cellular antennas, wireless broadband infiltrating their home or transmitting utility meters pulsing into their living spaces, etc.
- (10) No scientist or biologist or public health official is running the wireless radiation experiment on the populace. Therefore, all Americans are at risk as involuntary participants for any potential injury, disability, or death caused by the lack of protective RF limits and policies.

In light of the fact that government agencies “don’t know yet” if RF exposures are harmless or not, and that the continued proliferation of wireless at risky levels violates basic human rights as set forth in the Nuremberg Code, I would conclude that **“a precautionary action” taken by the FCC would be quite useful** and not at all counterproductive.

The precautionary action should involve an immediate moratorium on new wireless devices while the EPA undertakes a full environmental assessment of the biological impacts of RF on life and the environment. Couple this move with strong FCC incentives for the industry to “Get Wired” as much as possible using the limitless, lucrative, sustainable magic of fiber optic systems, and tried-and-true cable and landline connections. Such an **action would**

create efficient, practical impacts that would be 100% humane and ecologically sound. This **precautionary action would also save society the many costs** of imposing growing amounts of dubious RF radiation on people. It would prevent stressing the medical care system, the loss of productivity, mental acuity, genetics integrity, worker creativity, vitality and human longevity. Why not promote safe, sustainable technologies over ones with inherent, monumental, involuntary risks?

Thank you.

Respectfully submitted by

Charyl Zehfus

N6158 N. 61st Street

Sheboygan, WI 53083

September 12, 2013

(should you so choose)

Charyl Zehfus

Sworn to before me

(your signature)

This 12 day of September (month), 2013

Ann Saut
Notary Public

